

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: DIECA Communications, Inc., d/b/a/ Covad Communications Company

Contact: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

Subject Matter Expert (SME): Alice Chiu
Telephone Number: (408) 616-6844
e-mail: achiu@covad.com

Authorized Representative: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

IV. Issue Identification

Name: Detailed billing information

Brief Description: SBC Wisconsin should be required to provide its CLEC customers with detailed billing information sufficient to verify SBC's bills. A simple model wherein BANs are detailed by dated invoice would be sufficient and would allow the CLEC to understand how SBC has applied past due amounts. Without this information, the customer has great difficulty validating the SBC bills and it is difficult to determine how SBC has applied previous payments.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

This issue has existed since Covad began doing business in Wisconsin.

2. How many occurrences and approximately over how long a period of time?

This issue has occurred each month since Covad has been doing business in Wisconsin.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

There are basically two issues:

The first is that many of the bills that we receive are incomplete. The CSR details are missing from the paper bill and or OC&C Header is missing from the electronic sections of the bill. Also, the application of payments and credits are lumped together preventing COVAD from discerning what they are for.

The second problem is that Payments are not being posted by SBC in a timely manner. For example: a current aging report received from SBC on 7/21/2003 does not show payments that were made by COVAD on 6/10/2003. This causes many miss-understandings between SBC and COVAD and late fees are being incorrectly applied.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

No. Pursuant to the terms of its IA with Covad, "Ameritech Wisconsin will render a monthly bill for Network Elements" provided pursuant to the IA. What constitutes a sufficient bill is not addressed in the parties' IA.

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?

High

7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes, over the past several years by the Billing Department, and by External Affairs during IA negotiation.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

This issue was escalated from the Billing Department to External Affairs. It has not been the subject of formal dispute resolution.

3. Last known position of the opposing carrier.

SBC refuses to provide sufficiently detailed bills.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

No

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

The provision of detailed and sufficient bills. This response will be supplemented at a later date.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no current billing issues pertaining to Wisconsin. Based upon this message, SBC believes that COVAD is no longer pursuing this issue; consequently, no response is offered. In any event, a general redesign of wholesale bills is a matter of general interest to the CLEC community, not merely those doing business in Wisconsin. Accordingly, consideration of this issue here is inappropriate. Rather, the issue should be addressed in a forum of general application, such as the Open Billing Forum (OBF).

A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system

operation? *N/A*

4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no current billing issues pertaining to Wisconsin. Based upon this message, SBC believes that COVAD is no longer pursuing this issue; consequently, no response is offered.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *See above.*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *A general redesign of wholesale bills is a matter of general interest to the CLEC community, not merely those doing business in Wisconsin. Accordingly, consideration of this issue here is inappropriate. Rather, the issue should be addressed in a forum of general application, such as the Open Billing Forum (OBF).*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Michael E. Flynn*

Telephone Number: *(925) 823-7560*

e-mail: *mf1354@sbc.com*

Authorized Representative: *John T. Anderson*

Telephone Number: *(314) 235-5020*

e-mail: *ja3478@sbc.com*

X. Further Investigative Activities (for staff use only)

XI. Final Disposition (for staff use only)

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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Telephone Number: (408) 616-6844
e-mail: achiu@covad.com

Authorized Representative: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

IV. Issue Identification

Name: Time to Render Bill

Brief Description: SBC should be required to render monthly bills to its CLEC customers no later than 30 Calendar days after the month in which service is provided. Anything longer impacts the CLEC's financials and its ability to control expenses. The customer should not be required to pay untimely bills.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

This issue has existed since Covad began doing business in Wisconsin.

2. How many occurrences and approximately over how long a period of time?

This issue has occurred each month since Covad has been doing business in Wisconsin.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Unknown.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Pursuant to the terms of its IA with Covad, "Ameritech Wisconsin will render a monthly bill for Network Elements" provided pursuant to the IA.

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?

High

7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes, over the past several years by the Billing Department, and by External Affairs during IA negotiation.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

This issue was escalated from the Billing Department to External Affairs. It has not been the subject of formal dispute resolution.

3. Last known position of the opposing carrier.

SBC refuses to limit its monthly bills to services rendered in the preceding month.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

No

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue; consequently, no specific response is offered. In any event, to the extent that COVAD still wishes to pursue the issue raised, the issue either pertains to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or is properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4, and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information. *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *To the*

extent that COVAD still wishes to pursue the issue raised, the issues either pertain to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.

7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Tena Rylander*

Telephone Number: *(214) 858-0235*

e-mail: *tr5972@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

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Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

Subject Matter Expert (SME): Alice Chiu
Telephone Number: (408) 616-6844
e-mail: achiu@covad.com

Authorized Representative: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

IV. Issue Identification

Name: **Billing Disputes**

Brief Description: In the event of a billing dispute between SBC Wisconsin and a CLEC customer, neither party should be required to escrow the amount of any part of the disputed amount, nor should either party be authorized to terminate the parties' agreement for the failure to pay disputed amounts within the time frame specified for dispute resolution. The CLEC customer should not have to either pay the disputed amount upfront or put the same in escrow until the dispute is settled, as either scenario greatly impacts the CLEC's available cash on hand.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

This issue has existed since Covad began doing business in Wisconsin.

2. How many occurrences and approximately over how long a period of time?

This issue has occurred each month since Covad has been doing business in Wisconsin.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Unknown.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Pursuant to the terms of its IA, Covad is required to escrow disputed amounts.

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?

High

7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes, over the past several years by the Billing Department, and by External Affairs during IA negotiation.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

This issue was escalated from the Billing Department to External Affairs. It has not been the subject of formal dispute resolution.

3. Last known position of the opposing carrier.

SBC refuses to eliminate the escrow requirement.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

No

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue; consequently, no specific response is offered. In any event, to the extent that COVAD still wishes to pursue the issue raised, the issue either pertains to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information. *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*

5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *To the extent that COVAD still wishes to pursue the issue raised, the issues either pertain to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

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Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Peggy Beata*

Telephone Number: *(312) 335-7340*

e-mail: *tr5972@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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Subject Matter Expert (SME): Alice Chiu
Telephone Number: (408) 616-6844
e-mail: achiu@covad.com

Authorized Representative: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

IV. Issue Identification

Name: **Billing remittance**

Brief Description: The CLEC customer should be given a commercially reasonable deadline for remitting payment for SBC's bills, that is, remittance should be due within 30 days from the receipt by the CLEC of a detailed and accurate bill – whether in electronic or manual form - allowing the CLEC sufficient time to validate the bill.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

This issue has existed since Covad began doing business in Wisconsin.

2. How many occurrences and approximately over how long a period of time?

This issue has occurred each month since Covad has been doing business in Wisconsin.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Unknown, however, many bills are received late in the month. In some cases this can be in excess of 15 days past the bill date. This provides a very short window for Covad to be able to pay the bills on time.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Pursuant to the terms of its IA with Covad, "Ameritech Wisconsin will render a monthly bill for Network Elements" provided pursuant to the IA.

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?

High

7. Any other pertinent information?

Late Fees are being assessed on the bills that are sent late, and therefore received "late" because Covad is validating those bills.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes, over the past several years by the Billing Department, and by External Affairs during IA negotiation.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

This issue was escalated from the Billing Department to External Affairs. It has not been the subject of formal dispute resolution.

3. Last known position of the opposing carrier.

SBC refuses to limit its monthly bills to services rendered in the preceding month.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

No

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

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A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information. *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that*

COVAD is no longer pursuing this issue.

2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *To the extent that COVAD still wishes to pursue the issue raised, the issues either pertain to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

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Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Tena Rylander*

Telephone Number: *(214) 858-0235*

e-mail: *tr5972@sbc.com*

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Authorized Representative: William J. Cobb III
Telephone Number: (512) 469-3783
e-mail: bcobb@covad.com

IV. Issue Identification

Name: **Interest/late payment charges**

Brief Description: Both late payments and credited amounts should be subject to a commercially reasonable penalty, that is, interest on past amounts at the prime rate plus 1% annualized, determined on a yearly basis, to be set on January 1 of each calendar year. Reciprocal interest rates are only fair.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

This issue has existed since Covad began doing business in Wisconsin.

2. How many occurrences and approximately over how long a period of time?

This issue has occurred each month since Covad has been doing business in Wisconsin.

3. Is it a recurring problem?

Yes

4. Your belief as to the cause of the problem.

Unknown.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Unknown at this time.

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?

Medium

7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes, over the past several years by the Billing Department, and by External Affairs during IA negotiation.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

This issue was escalated from the Billing Department to External Affairs. It has not been the subject of formal dispute resolution.

3. Last known position of the opposing carrier.

Unknown at this time.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

No

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue; consequently, no specific response is offered. In any event, to the extent that COVAD still wishes to pursue the issue raised, the issue either pertains to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g. COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information. *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *By message sent to SBC from the COVAD SME identified above, COVAD indicated that it had no critical billing issues pertaining to Wisconsin. Based on that message, SBC believes that COVAD is no longer pursuing this issue.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *To the*

extent that COVAD still wishes to pursue the issue raised, the issues either pertain to the CLEC community as a whole, (e.g., COVAD Issues #1 and #2 should be addressed in the OBF or CLEC User Forum), or are properly addressed in 251/252 negotiations (e.g., COVAD Issues #3, #4 and #5); indeed, these latter three issues were raised by TDS in its arbitration in Docket 05-MA-123.

7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*